

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO (CLEVELAND)**

In Re:

CHARLES L. MOTTON and  
LORNA P. BARRETT-MOTTON,

Debtors.

Chapter 13 Case No. 12-14425-JPS

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that on April 9, 2021, the undersigned filed a **Joint Motion to Withdraw Motion to Reopen Chapter 13 Case and for Declaratory Ruling Regarding Discharge**. Pursuant to LBR 9013-3, Notice is hereby given that any response or objection must be filed no later than **April 30, 2021**, if the relief sought is opposed, and that the Court is authorized to grant the relief requested without further notice unless a timely objection is filed.

Respectfully submitted,

Dated: April 12, 2021

s/ James K. Schultz

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 12, 2021, a true and correct copy of **Notice of Joint Motion to Withdraw Motion to Reopen Bankruptcy** was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Debra E. Booher, on behalf of Charles L. Motton and Lorna P. Barrett-Motton, debtors, at [charlotte@bankruptcyinfo.com](mailto:charlotte@bankruptcyinfo.com)

Craig H. Shopneck, on behalf of Chapter 13 Trustee's office at [ch13shopneck@ch13cleve.com](mailto:ch13shopneck@ch13cleve.com)

Timothy M. Sullivan, on behalf of State of Ohio Department of Taxation, creditor, at [tim@tmslaw.net](mailto:tim@tmslaw.net) and [jkoberg@tmslaw.net](mailto:jkoberg@tmslaw.net)

Ronald I. Frederick, on behalf of Charles L. Motton and Lorna P. Barrett-Motton, debtors, at [ronf@clevelandconsumerlaw.com](mailto:ronf@clevelandconsumerlaw.com)

s/ James K. Schultz

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